



INDEPENDENT ENVIRONMENTAL
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October 9, 2009

Ms. Sharon Fang, P.E.
Remedial Project Manager (3HS21)
U.S. EPA Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Re: Metal Bank Cottman Avenue NPL Site
Monthly Report due October 10, 2009
Reporting Period: September 1 through September 30, 2009

Dear Ms. Fang:

As provided in Paragraph 31 of the Utility Consent Decree, and on behalf of the Cottman Avenue PRP Group, Malcolm Pirnie as the Supervising Contractor is submitting to USEPA three copies of a written monthly progress report. Copies of the monthly progress reports are attached to this letter.

Please contact the Designated Project Coordinator, Dr. John Dobi (973.430.8036) or me (610.360.4895) if you need additional information regarding this submission.

Very truly yours,
MALCOLM PIRNIE, INC.

Wyn V. Davies, CIH
Senior Associate

Cc: Cottman Avenue PRP Group
Steering and Technical Committees
Joseph Vitale, P.E.
Raymond E. Lees, P.E., CHMM
Dan J. Jordanger, Esquire

Enclosures
3809009



Project Name: Metal Bank NPL Site	For the Month: September 2009	
Project Location: Philadelphia, PA	Report Number: 42	Dated: Oct. 9, 2009

Name: Wyn Davies (Malcolm Pirnie, Inc.)	Title: Project Manager
Telephone No.: (610) 360-4895	Telefax No.: (610) 768-5817
Reporting Period: September 1 through September 30, 2009	
(a) Describe the actions which have been taken toward achieving compliance with the Consent Decree during the previous month:	
<p>Remedial action continued throughout the month of September (Second full month of Phase II). Activities included the following:</p> <ul style="list-style-type: none"> • Continued to maintain soil and erosion controls in both upland and mudflat areas. • Continued to maintain the absorbent boom, hard oil boom, and turbidity curtain in the Delaware River isolating the construction zone from the river. • Completed backfilling tiebacks with Structural Fill material from ABC Construction. (ANS Consultants to continue compaction testing). Placed approx. 7,700 Tons of Structural Fill to date. • Completed sediment removal operations in the mudflat area with the Manitowoc 2250 crawler crane and environmental digging bucket/conventional digging bucket removing approximately 1,550 CY. • Initiated the placement of the R-3 backfill stone in the Mudflat area placing approximately 1,700 tons of stone during the reporting period. • Initiated sediment removal operations in the deep area with the Manitowoc 2250 crawler crane and environmental digging bucket/conventional digging bucket removing approximately 2,300 CY during the reporting period. • Initiated sediment placement on the Southern Cap area with all excavated materials to-date meeting Consent Decree standards for on-site placement. • Completed the soil sampling of excavated sediments from the mudflat area and initiated four rounds of sampling of the deep sediments. • Completed the temporary sheet pile wall / turbidity containment of approx. 730 LF. • Discharged treated water from Temporary Wastewater Treatment Plant. • Continued the construction of the Triton Marine Mattresses at the Bensalem site. Approximately 190 mattresses constructed during the reporting period. • Initiated and completed the marine mattress placement in the Eastern Subaqueous Cap area. Placed 133 mattresses to complete this cap area. • Initiated placement of Triton marine mattresses in the Western Sub Aqueous Cap Region. Placed 24 (35' x 5) mattresses along the Western portion of the cap area. 24 mattresses / 214 mattresses estimated = 11 % complete in Western Sub Aqueous Cap region. 	

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- Initiated waler repairs in Zone 2 of the permanent sheet pile wall as per AMEC's recommendation.
- Continued to cut the permanent sheet pile wall to desired design elevation (EL 11).
- Continued site survey activities. (Sheet Pile wall monitoring).
- Continued to mobilize equipment, personnel and materials.
- Continued general housekeeping and site maintenance.
- Maintained haul roads as necessary.
- Collected data from the four turbidity meters for background and intrusive work.
- Provided access to the site for the US EPA to monitor the work related to the approved Severson RAWP.

(b) Include a summary of all results of sampling and tests and all other data received or generated by Settling Third-Party Defendants or their contractors or agents in the previous month:

Item	Submittal	Date
Mudflat Sediment Analytical Summary	F111s	9/04/09
Mudflat "as built" Post Excavation Certified Drawings	F112s	9/09/09
Cover Soils from ABC Construction	F113s	9/11/09
Pre-Cast Concrete Vault Structures for LNAPL Recovery	F114s	9/16/09
LNAPL Trench Material Components	F115s	9/22/09
Geotechnical Information/Testing Results for Dredged Sediments	F116s	9/20/09

(c) Identify all work plans and other deliverables required by the Consent Decree completed and submitted during the previous month:

- EPA request of Cottman Ave PRP Group to allow EPA to tie-off boats collecting water column data at the Severson turbidity monitoring locations (9/03/09)
- Cottman Ave PRP Group to EPA – Approval to allow EPA to tie-off boats collecting water column data at the Severson turbidity monitoring locations (9/08/09)
- Cottman Ave PRP Group to EPA – Request of the regulatory agencies accessing the exclusion zone of the site to provide Severson the appropriate HAZWOPER documentation prior to entrance into the exclusion zone (9/8/09)
- PADEP to Cottman Ave PRP Group & EPA - Response to agencies accessing the exclusion zone of the site and providing Severson the appropriate HAZWOPER documentation prior to entrance into the exclusion zone (9/8/09)
- Cottman PRP Group to EPA – Final tie rod design evaluation report (9/8/09)
- EPA response to Cottman Ave PRP Group EPA regarding the turbidity monitoring

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clarifications submitted on Sept 3, 2009 (9/09/09)

- Cottman Ave PRP Group to EPA – Repair strategy for the central marine mattress area (9/11/09)
- Cottman Ave PRP Group to EPA – Submittal of the “as built” mudflat sediment excavation drawings indicating that the remediation surface was attained and verified by a licensed surveyor (9/14/09)
- EPA to Cottman Ave PRP Group – EPA response to the final tie rod design evaluation report (9/15/09)
- Cottman Ave PRP Group to EPA – Submittal of proposal for the Cover Soils for capping and the additional regulatory approvals required prior to placement (9/16/09)
- EPA to Cottman Ave PRP Group – Regulatory concerns regarding the 300T crane setback while performing the sediment excavation and backfilling operations (9/16/09)
- Cottman Ave PRP Group to EPA – Response to the EPA Comments on the turbidity monitoring clarifications (9/16/09)
- Cottman Ave PRP Group to EPA – Response to regulatory concerns regarding the 300T crane setback while performing the sediment excavation and backfilling operations (9/16/09)
- EPA to Cottman Ave PRP Group – Regulatory data on waste water treatment plant split sampling results (9/21/09)
- EPA to Cottman Ave PRP Group – Regulatory comments regarding the submittal of proposal for the Cover Soils for capping and the additional regulatory approvals required prior to placement (9/25/09)
- Cottman Ave PRP Group to EPA – Submittal of the final LNAPL relocation engineering plans for their and ACOE use (9/28/09)
- EPA to Cottman Ave PRP Group – Regulatory recognition of the submittal of the final LNAPL relocation engineering plans for their and ACOE use (9/29/09)
- EPA to Cottman Ave PRP Group – Review of meeting issues involving the revegetation and seed application, cap compaction requirements, sheet pile monitoring evaluation results, deep sediment confirmation, and central marine mattress repair (9/29/09)
- Cottman Ave PRP Group to EPA – Strategy for pre-characterization of the potential waste streams from the LNAPL trench excavation activity (9/29/09)
- EPA to Cottman Ave PRP Group – Initial comments on the strategy for pre-characterization of the potential waste streams from the LNAPL trench excavation activity (9/30/09)

(d) Describe all actions, including, but not limited to, data collection and implementation of work plans, which are scheduled for the next month and provide other information

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relating to the progress of construction, including, but not limited to, critical path diagrams, Gantt charts, and Pert charts:

- The current construction schedule for the completion of the Phase II Construction is attached (dated October 5, 2009) that includes critical dependencies for the performance of the work by Severson.
- The anticipated Phase II construction activities for October include:
 - Complete the installation of the Geotextile and backfill with R-3 stone in the Mudflat area
 - Complete the excavation of the Deep Sediments
 - Complete the installation of the Geotextile and backfill with R-3 stone in the Deep Sediment area
 - Complete Marine Mattress placement in the Western Area
 - Grade mudflat and deep sediments as sub grade for southern cap
 - Complete repair/cutting of permanent sheet pile wall
 - Complete construction of marine mattresses for use by Severson
 - Initiate the construction of the Southern Cap
 - Initiate the construction of the LNAPL Trench
 - Initiate the installation of the buttress material along the marine mattresses
 - Complete the armoring of the drainage pipe discharging into the Eastern Marine Mattress Area
 - Continue turbidity monitoring with (4) YSI turbidity monitors
 - Maintain site roads and tire scrubbers
 - Maintain the soil & erosion aspects
 - Continue operation of the waste water treatment plant
 - Continue general housekeeping and site maintenance
 - Severson / Rettew to continue site survey activities as necessary

(e) Include information regarding percentage of completion, unresolved delays encountered or anticipated that may affect the future schedule for implementation of the Work, and a description of efforts made to mitigate those delays or anticipated delays:

- Construction estimated at 80% complete as of the end of September.
- As of the end of September, the project was three days behind the base schedule prediction.

(f) Include any modifications to the work plans or other schedules that Settling Third-Party Defendants have proposed to EPA or that have been approved by EPA:

- NONE

(g) Describe all activities undertaken in support of the Community Relations Plan during the previous month and those to be undertaken in the next month:

- The Cottman Ave PRP Group continued contact with the Quaker City Boat Club on the need for relocation of docking buoys.
- The Group intends to coordinate with EPA on its community outreach endeavors on an as needed basis through the Phase II construction period.